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Ticona

September 27, 2012
EIJ-069-12
TPI Project – 07082011-MISC

Bishop Facility
Highway 77 South
P.O. Box 428
Bishop, TX 78348

RECEIVE

Certified Mail
7010 0780 0000 1768 1174

Mr. David Eppler
Air Toxics and Inspection Coordination Branch
U.S.EPA Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

SEP 1 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

Subject: **Clean Air Act ("CAA") Section 114 Information Request –
Supplemental Monthly Response**

Dear Mr. Eppler,

As agreed to during our meeting on December 20, 2011, Ticona Polymers, Inc. (TPI) is submitting the following update relating to the EPA's Section 114 Information Request. The team continues to work diligently on this project and is providing this update to apprise you of our progress.

After our July 16, 2012 submittal Ticona Polymers, Inc. engineers have been working on the design and procurement of materials to install an 8" natural gas line to supplement the MO-4 flare with needed natural gas. On 7/31/2012 a Management of Change was issued authorizing a change to our normal operation.

MOC#: 20122603 Date of Origination: 7/31/2012
MOC Coordinator: Patel, Samyak
Area/Unit: BIS_MO IV
Equipment: Natural Gas Pipeline to V-3066
Title: Enlarge 6" Natural Gas Pipe Servicing MO-4 flare to 8" Pipe

Description of Change (include technical basis):

The flare system in the MO-IV unit (T-531) was initially designed as a non-steam assisted flare. Recently, the EPA has reviewed and categorized this flare as steam assisted flare due to center steam addition. The difference in operational requirements between steam assisted and non-steam assisted is the net heating value (NHV) of the gas combusted through the flare. A steam assisted flare is required to operate at a NHV of 300 BTU/scf and non-steam assisted flare is required to operate at 200 BTU/scf at the tip of the flare with 98% combustion of all VOC's. The current MO-IV flare system operates at a NHV of 200 BTU/scf due to design specification. Additional natural gas to the flare will increase the NHV of the MO-IV flare to satisfy EPA standards. This project will replace a



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section of 6" piping with 8" piping and replace a 4" control valve with an 8" control valve.

As of September 26, 2012 the project engineer update is as follows:

"The design work for this project is approximately 75% complete. The target is to start pre-fabrication by mid next week. We will have a crew working on a parallel installation until the December MO-4 unit outage. The plan is to have the pre-fabrication finished and ready for tie-ins by the MO-4 December unit shut down."

As progress continues on this project TPI will submit reports to keep you informed. Should you have any questions or need additional information, please contact me at (361) 584-6104.

Sincerely,

A handwritten signature in cursive script, appearing to read "Buddy Joyner".

Buddy Joyner
Sr. Environmental Specialist II